

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

DENNIS BALLARD, et al.

PLAINTIFFS

V.

CIVIL ACTION NO.: 4:23-cv-00161-DMB-JMV

**WILLIAM J. “JERRY” NOBILE,
JERRY NOBILE FARMS, INC.,
WILLIAM J. “WILL” NOBILE, JR.,
WILL NOBILE FARMS, INC.**

DEFENDANTS

**UNOPPOSED MOTION FOR ADDITIONAL TIME ADDITIONAL
TIME TO RESPOND TO PLAINTIFFS’ COMPLAINT**

Defendants William J. “Jerry” Nobile, Jerry Nobile Farms, Inc., William J. “Will” Nobile, Jr., and Will Nobile Farms, Inc. (collectively “Defendants”), file this motion for additional time to respond to Plaintiffs’ Complaint in the above matter. In support of this motion, Defendants state as follows:

1. Plaintiffs served Defendants with the Complaint on October 5, 2023, making Defendants’ responsive pleading due on or before October 26, 2023.
2. Counsel for Plaintiffs and for Defendants desire to engage in early settlement discussions. To that end, they have already exchanged a significant amount of information in an effort to facilitate meaningful settlement discussions, which Plaintiffs’ counsel is processing.
3. In addition, Plaintiffs’ Complaint is lengthy, containing thirteen pages of factual allegations to be addresses. The additional time will allow the parties to focus on attempting to reach a resolution without expending fees in responding to Plaintiffs’ lengthy Complaint.
4. Plaintiffs have advised that they do not oppose this motion.
5. Given the straightforward nature of this motion, Defendants request to be relieved of the requirement to submit a supporting memorandum pursuant to Local Uniform Civil Rule 7(b)(4).

WHEREFORE, PREMISES CONSIDERED, the Defendants pray that the Court enter an Order providing all Defendants through and including December 22, 2023, to respond to Plaintiffs' Complaint.

Dated: October 25, 2023

Respectfully submitted,

**WILLIAM J. "JERRY" NOBILE, JERRY NOBILE
FARMS, INC., WILLIAM J. "WILL" NOBILE, JR.,
WILL NOBILE FARMS, INC., DEFENDANTS**

By: /s/ Timothy M. Threadgill
TIMOTHY M. THREADGILL (MB #8886)

ONE OF THEIR ATTORNEYS

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Timothy M. Threadgill, do hereby certify that I have this day served via ECF filing and electronic mail a true and correct copy of the above and foregoing document to the following:

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Counsel for Plaintiffs

Dated: October 25, 2023

/s/ Timothy M. Threadgill
TIMOTHY M. THREADGILL